

**REMARKS**

Claims 1-10, 12-15, 22, and 23 are pending. Claims 16-21 are withdrawn. By this Amendment, claim 11 is cancelled without prejudice or disclaimer, the Specification at paragraph [0020] and claims 1, 2, 10, 16, 22, and 23 are amended. No new matter is presented in this Amendment.

Paragraph [0020] and claims 2, 16, and 23 are amended to correct informalities. Claims 1 and 22 are amended to clarify the recited subject matter, and claim 10 is amended to correct an informality and to include the subject matter of cancelled claim 11. Support for the amendments to claims 1, 10, and 22 is found in the drawing figures and various passages of the Specification.

For the following reasons, reconsideration is respectfully requested.

**REJECTIONS UNDER 35 U.S.C. §102:**

Claims 1, 3, 4, 7-13, 15, 22, and 23 are rejected under 35 U.S.C. §102(e) as being anticipated by Arnold et al. (U.S. Patent 7,038,373). Rejection of cancelled claim 11 is moot. As to the remainder of the claims, the rejection is respectfully traversed.

It is respectfully submitted that Arnold fails to disclose or suggest, an organic electroluminescent display device, comprising a lower electrode formed on the substrate, the lower electrode having a substantially planar upper surface at a first step difference above the substrate, and a pixel define layer formed on the substrate and covering one portion of the lower electrode while exposing another portion of the lower electrode, the pixel define layer having an upper surface at a second step difference above the substrate, wherein the second step difference of the pixel define layer is less than or substantially equal to the first step difference of the lower electrode, as recited in claim 1.

Also, Arnold fails to disclose or suggest, an organic electroluminescent display device, comprising lower electrodes formed in the corresponding pixel regions, and having substantially planar upper surfaces, buffer patterns formed between the substrate and the corresponding lower electrodes, and pixel define layers disposed between adjacent pairs of the lower electrodes and having upper surfaces, wherein the upper surface of each of the pixel define layers is substantially coplanar with or lower than the upper surfaces of the corresponding

adjacent lower electrodes due to the corresponding buffer pattern, as recited in claim 10.

Also, Arnold fails to disclose or suggest, an organic electroluminescent display, comprising a substantially planar first electrode formed to a first height above the substrate, and a pixel define layer formed to a second height above the substrate to define the first electrode within a corresponding pixel without covering a portion of the first electrode, wherein the first height is substantially the same as or greater than the second height, as recited in claim 22.

Arnold fails to disclose or suggest a lower electrode having a substantially planar upper surface, lower electrodes formed in the corresponding pixel regions and having substantially planar upper surfaces, or a substantially planar first electrode, as respectively recited in claims 1, 10, and 22 because Arnold shows a first patterned electrode 18 with a periodic grating structure conforming to the periodic grating structure of the underlying insulating layer 16 (see for example, FIG. 3, and col. 4, lines 44-52 of Arnold). The first patterned electrode 18 of Arnold lacks a substantially planar upper surface and is not substantially planar. Accordingly, Arnold fails to disclose or suggest each and every feature of claims 1, 10, and 22.

Also, Arnold fails to disclose or suggest the second step difference of the pixel define layer that is less than or substantially equal to the first step difference of the lower electrode, the upper surface of each of the pixel define layers that is substantially coplanar with or lower than the upper surfaces of the corresponding adjacent lower electrodes due to the corresponding buffer pattern, or the first height that is substantially the same as or greater than the second height, as respectively recited in claims 1, 10, or 22 because Arnold shows a patterned first insulating layer 17 with an upper surface that is higher than the upper surface of the first electrode 18 (see, for example, FIG. 2, and col. 3, lines 44-54 of Arnold). Accordingly, Arnold fails to disclose or suggest each and every feature of claims 1, 10, and 22.

Consequently, claims 1, 10, and 22 are patentable over Arnold. Claims 3, 4, and 7-9, which depend from claim 1, claims 12, 13, and 15, which depend from claim 10, and claim 23, which depend from claim 22, are likewise patentable over the applied reference to Arnold for at least the reasons discussed above, and for the additional features they recite. Withdrawal of the rejection is respectfully requested.

**REJECTIONS UNDER 35 U.S.C. §103:**

Claims 2, 5, 6, and 14 are rejected under 35 U.S.C. §103(a) as being unpatentable over Arnold et al. (U.S. Patent 7,038,373), in view of Fujita et al. (U.S. Patent 6,758,538).

As discussed above, Arnold fails disclose each and every feature of claims 1 and 10, from which claims 2, 5, 6, and 14 respectively depend. Fujita fails to overcome the deficiencies of Arnold, and the combination would not render the claims obvious. Consequently, claims 2, 5, and 6, which depend from claim 1, and claim 14, which depend from claim 10, are patentable over the applied references and their combination for at least the reasons discussed above, and for the additional features they recite. Withdrawal of the rejection is respectively requested.

**CONCLUSION:**

There being no further outstanding objections or rejections, it is submitted that the application is in condition for allowance. An early action to that effect is courteously solicited.

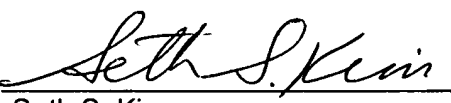
Finally, if there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 503333.

Respectfully submitted,

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